

May 14, 1934

Bureau of Land Management
Shoshone District
c Ervin Cowley
P.O. Box 2E
Shoshone, Idaho 83352

Dear Mr. Cowley:

This correspondence is in response to your Draft Monument Resource Management Plan and Environmental Impact Statement, (RMP/EIS), which affects our District in the vicinity of Craters of the Moon National Monument area of Butte County.

This area of Putte County is included in the Great Rift WCA recommended to Congress by the BLM in a previous study as suitable for wilderness designation. Thus, all alternatives of the Draft RMP/EIS identify this area to be managed in accordance with BLM Wilderness Management Policy, with specific management provisions to be developed following congressional designation.

U.S. highway 93, 2P, 2S has been used as the Northern boundary of the WSA in Butte County. Our District of the Idaho Transportation Department has studied this section of highway and has determined that, for safety purposes, the roadway should be widened to 40' with 10' shoulders and 2% superelevations on the curves. This realignment would affect several hundred acres of the WSA, if implemented as planned. LRA management Policy, however, apparently precludes such actions in designated or proposed riparian areas. The appropriate resolution to this issue is only one of many concerns of this District regarding our review of your draft RMP/EIS.

Sincerely,

J. R. Dick
J. R. DICK, P.E.
District Engineer

קת

SAFE TRANSPORTATION MEANS PROGRESS
EQUAL OPPORTUNITY EMPLOYER

Response to Letter Number 2

2-1 Reference to the "well drilling permit" has been deleted in the final EIS.



JOHN V. EVANS

A. KENNETH DUNN
Oregon

May 16, 1984

Charles J. Haszier
District Manager
Bureau of Land Management
Shoshone District
P.O. Box 2B
Shoshone, ID 83352

RE: Monument RMP/EIS Draft

Dear Mr. Haszler:

This Department has reviewed the referenced plan. The following comments are provided.

2-1 ° Reference to "well drilling permit" on page 3-14 is incorrect. While an approved water permit is required and a licensed driller must drill the well, a well drilling permit is not needed.

* The reference to soils classification and suitable vs. unsuitable classification on page 3-31 is acceptable. The Department requests that anytime that an acreage is classified unsuitable due to an excess of Class IV soils, a field exam will be made if the applicant so requests.

Other items which will be of importance if any development occurs, are water availability (water permits) and irrigation run-off (injection wells). To minimize adverse impacts, best management practices must be followed.

In the RMP, on page 4-60 Lands, reference is made to 13,965 acres which would not be considered for transfer under the Carey Act. Would you please send me a list of the Carey Act Projects involved and the acreages.

Sincerely,

John D. Carlson

JOHN D. CARLSON
Construction Permits Section

JDC:SC

Letter Number 2

State of Idaho

DEPARTMENT OF WATER RESOURCES

STATE OFFICE, 450 W. State Street, Boise, Idaho

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JUNE 8 1964			
CIVIL RIGHTS			
SOCIAL JUSTICE			
ECONOMICS			
POLITICS			
AM. NEWS			
MAY 18 1984			
BUREAU OF MANAGEMENT SOCIOLOGY DIVISION			
ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED			
DATE 07-18-2001 BY SP-6 JAC/jac			

Mailing address:
Statehouse
Boise, Idaho 83720
(208) 334-4440

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United States Department of the Interior

FISH AND WILDLIFE SERVICE
ENDANGERED SPECIES PROGRAM
 4620 Overland Road, Room 209
 Boise, Idaho 83705

DATE: May 16, 1984

TO: District Manager, BLM, Shoshone District, Shoshone, ID

FROM: Assistant Field Supervisor, FWS, Ecological Services, Boise

SUBJECT: Review of Monument Resource Management Plan/Environmental Impact Statement (FWS-1-4-84-I-338)

The U.S. Fish and Wildlife Service has reviewed the Monument Resource Management Plan with respect to listed and candidate species. We find your analysis to be complete with respect to the listed and candidate species status.

Although we have no direct authority with respect to candidate species until they are federally listed, we support the direction that the plan taken with respect to the ferruginous hawk, Swainson's hawk, Shoshone sculpin and Snake River suils. Also, we encourage you to allocate funds and staff time for development of nesting opportunities for both raptor species. My staff can be made available (on a limited basis) to assist you in these management efforts.

We also concur with the efforts you are taking to include candidate plant species in your evaluations. The direction you are taking in affording their protection is welcomed.

Thank you for your interest in the conservation of rare species.

James F. Gore

cc: FWS, AFA, Portland
IDFG, Hdqtrs., Boise
IDFG, Region 4, Jerome



U. S. DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION
IDAHO DIVISION
3010 WEST STATE STREET
BOISE, IDAHO 83703

Letter Number 4

May 29, 1984

Mr. Ervin Cowley, Project Manager
Bureau of Land Management
P. O. Box 28
Shoshone, Idaho 83352

Draft Monument Resource Management Plan/
Environmental Impact Statement

Dear Mr. Cowley:

We have reviewed the referenced document and have not identified any impacts to any Federal-aid highway.

Thank you for providing us the opportunity to comment on your project.

Sincerely yours,

Robert G. Clour
Robert G. Clour
Assistant Division Administrator

Pocatello Trail Machine Association



P. O. Box 4459

There are those, as you well know who protect about anything in which they are not interested.

Before any definite plans are made for this area we would appreciate the opportunity to tour the location with you to gain a better understanding of what is proposed.

Sincerely
Chuck J. Hollins
Director P.T.M.A.
201 Henry
Pocatello Ida 83202

Pocatello Trail Machine Association

Letter Number 5



P. O. Box 4459

Charles J. Kozier
District Manager
Shoshone District B.L.M.
Shoshone Ida 83352

May 29, 1984

Dear Chuck

In regard to the Monument Resource Management Plan I would like to express the concerns of the members of the Pocatello Trail Machine Association.

We are, on the one hand encouraged that your preferred alternative recognizes the recreational value of the Cedar Fields area, and distressed that this alternative proposes seasonal restrictions in this area during the time we are usually there. The restriction from Jan. 1 to May 1 could have a very serious effect on our use as in many years this is the only winter riding area open in Southeast Idaho. While this area has received very heavy O.R.V. use for over 20 years, the conflicts have been few and the negative impacts negligible.

While I am sure there have been some negative comments from a few users of the Massacre Rocks State Park, I am sure that for every person that is offended by our use of the desert across the river, there are five people who would enjoy watching us.

Response to Letter Number 5

5-1 A 'limited' designation is intended to allow ORV activity while protecting other resource values. The impact on ORV use is recognized in the draft and final EIS, but use will be allowed to continue. High ORV values in the Cedar Fields area have been recognized, as have high scenic values, high density of cultural resources, and erodible soils. The Bureau of Reclamation, which administers the majority of public land in the Cedar Fields area, has designated Bureau of Reclamation lands "limited" to ORV use. A BLM "limited" designation is consistent with Bureau of Reclamation administration of this area. Since Bureau of Reclamation limitations are not seasonal in nature, the seasonal nature of proposed BLM limited designations in the Cedar Fields area have been changed to a year-round limitation in Alternative C of the final EIS.

Interested organizations and individuals will have the opportunity to work with the BLM in developing specific limitations.

Letter Number 6
June 5, 1984

Mary Rosczyk
16173 Ballantine Ln.
Huntington Beach, Cal. F.
92647

Mr. Ervin Cowley
Project Manager
Bureau of Land Management
P.O. Box 28
Shoshone, Idaho 83352

Dear Mr. Cowley,

I welcome the opportunity to comment on the Draft Monument Resource Management Plan/Environmental Impact Statement and regret that I cannot attend the public hearing. I will not discuss those issues which are essentially the same for all the alternatives. I will mention that each alternative is generally well thought-out in addressing its primary concern. As to which of the alternatives should be selected, I feel that the only responsible choice lies between Alternatives C and D, with D being superior to C.

Alternative A doesn't include Box Canyon which I feel must be preserved because

as suggested in Alternative C. The rate should be at least 9.3 acres/AUM (Alternative A) or 15.3 acres/AUM as provided in Alternative D. A drought year like 1977 is an actuality and I don't think that a "temporary suspension" would work as well in fact as it does on paper. Finally, improvement and 20-year maintenance for Alternative D would cost considerably less than both Alternatives C or B.

Sincerely,
Mary Rosczyk

MARY LOU ROSE
16173 BALLANTINE LN
HUNTINGTON BEACH CA 92647

-2-

of its natural beauty. Alternative B would be an extremely poor choice because of the possibility for agricultural development in the Lake Walcott area with the erosion that would ensue. Neither Alternatives A or B include Sand Butte which is important since it contains the only natural Ferruginous Hawk nest, and neither A nor B protect the Silver Sage Playa with its select vegetation community. I don't think it would be feasible at this time to discontinue grazing which would eliminate Sub-Alternative D.

In comparing Alternatives C and D, I feel some of the Wilderness Study Areas (WSA) are more important than others, but would like to see all six WSA's included. Only Alternative D includes all six WSA. More important than this however are several other issues: Only Alternative D would decrease soil erosion, which is of primary importance. I don't agree with the livestock stocking rate of 5.9 acres per AUM

-3-

WRITTEN PROTEST

Letter Number 7

Paul, Idaho
June 11, 1984

Ervin Cowley, Project Manager
Bureau of Land Management
P.O. Box 28
Shoshone, Idaho 83352

Re: Desert Land Entry I-7258
Monument Resource Management Plan and Draft EIS (Correspondence 1601)

Dear Mr. Cowley:

I would like to protest the proposed uses of the land which my DIE (I-7258) is filed upon under Alternatives A, B, and C of your Draft RMP/EIS. Alternative D appears to me to be the only logical and acceptable alternative.

Alternative A allows very little agricultural development, including not allowing the development of my DIE. This option is totally unacceptable as it is imperative that at least some agricultural lands are developed. There appears to be no balance whatsoever between the competing agricultural, environmental, and rangeland interest. Suitable lands should be developed to provide jobs, taxes, and economic growth for the area.

Alternative B provides for a much better attitude toward new land development. My objection here is that on my personal DIE the proposal is for a general transfer use. This proposal fails to recognize that I have a valid DIE filing on this parcel of land and have had for 11 years. A more appropriate designation would be for Transfer-Agricultural Entry Only as under Alternative D. A Transfer-Agricultural Entry Only would be much more equitable and non-discriminatory to all involved.

Alternative C, the preferred alternative, is a generally acceptable proposal to me, although again it proposes to release the land on which I am filed by another means. In this instance it is through a Bureau Of Reclamation transfer for agricultural development. I strongly object to this claim-jumping maneuver by the Bureau of Reclamation. Although I am flattered that the Bureau of Reclamation appears to think that I have a grand idea in developing these lands, I would like to remind you, Mr. Cowley, that it was my idea approximately a decade earlier to do the same thing. This land would be much better developed under a private development rather than squander government (tax) dollars on a plan that will cost twice as much to achieve the same means. Also under the Bureau of Reclamation's draft plan they claim that private developers would be unable to obtain water rights but that they can. This idea is totally false as I have obtained water rights for this land myself already and it has cost me a considerable sum of money, as you are aware.

Therefore, Mr. Cowley, I would request that whichever alternative you select that it be modified to list the lands which my DIE is filed on in a Transfer-Agricultural Entry Only category. This is the only suitable category to list these lands in to achieve just and proper social, economic, and environmental needs within our community and state.

I would like to sincerely thank you for this opportunity to provide my comments and opinions on your draft RMP/EIS.

Kent L. Klosterman
Box 542
Paul, Idaho 83347
DIE I-7258

Response to Letter Number 7

- 7-1 The Monument RMP does not recognize any DLE applications specifically by applicant or length of application.

The text has been changed under "T1-Transfer" in Chapter 2 of the final EIS to indicate that agricultural entry applications or other proposals for land transfers will be considered in the order they were or are received. Thus, if a DLE application preceded other transfer proposals, the DLE application would be considered first.



United States Department of the Interior

BUREAU OF RECLAMATION
FEDERAL BUREAU OF SURVEY
FEDERAL BUILDING & U.S. COURTHOUSE
BOX 900-500 WEST FORT STREET
BOISE, IDAHO 83725

IN REPLY
REF ID: A111110 PH 150
120.1

JUN 19 1984

Letter Number 8

NO. ENTRY	DATE	BY	INITIALS
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Memorandum

To: Project Manager, Bureau of Land Management, Shoshone, Idaho
From: Acting Regional Director, Bureau of Reclamation, Boise, Idaho
Subject: Review of Draft Environmental Impact Statement--Monument Resource Management Plan, Idaho

We have reviewed the subject document and find Alternative C, the Preferred Alternative, consistent with the Bureau of Reclamation planning effort for the Minidoka North Side Pumping Division Extension Project. Based on recent discussions between you and members of our staff, it is our understanding that certain Bureau of Land Management lands identified for Bureau of Reclamation transfer (T-4) may be approved for private entry (T-2, Transfer to Agriculture Only). Our planning effort could accommodate a change such as this.

The allocation of uses for the Bureau of Land Management lands earmarked for Reclamation transfer (T-4) has been completed and approved by both irrigation and wildlife interests. We have enclosed maps and data showing the proposed land uses and an acreage summary by 40-acre subdivision. The allocations are as follows:

Irrigation	1,340 acres
Critical wildlife habitat tracts	933 acres
Other wildlife areas	1,478 acres
Total	3,751 acres

Thank you for the opportunity to review this document. Please let us know if we can be of further assistance.

John W. Kley

Enclosures

cc: Commissioner of Reclamation, Washington, D.C., Attention: 150

Letter Number 9

June 20, 1984

John Husband, Planning & Environmental Coordinator
Bureau of Land Management
P. O. Box 2 B
Shoshone, ID 83352

Dear Mr. Husband:

- 9-1 I would like to see Plan B or Plan C of the RMP adopted. I would like to see DLE of Kim Irwin corrected. It appears on the Map Number 3 that some land in T. 8 S., R. 26 E., Section 13 has been left out.

G. F. Irwin
Rt. 4, Box 149
Rupert, ID 83350

G. F. Irwin

Response to Letter Number 9

- 9-1 Due to the scale of the maps in the EIS, some small parcels are difficult to show clearly. A review of our information indicates that the entire parcel referenced is shown on the map as a T2 area, transfer for agricultural entry.

Response to Letter Number 10

Rt. 2, Box 75
Gooding, ID 83330
June 20, 1984

Ervin Crowley
Project Manager
Bureau of Land Management
P.O. Box 2 B
Shoshone, ID 83352

Dear Sir:

I wish to address the Monument Resource Management E.I.S. draft statement.

1. Control of noxious weeds needs to be made stronger including the provision that noxious weeds will be controlled, regardless of expense and even at the detriment of wildlife habitat.
2. Regarding livestock grazing-I will limit my comments to South Gooding Allotment in specific. I don't believe that your studies validate calling it in the static trend. I think your studies clearly show it in an upward trend. Also, I see no reason for it not to be included in plans for range improvement. I disagree with Map 15 including the South Gooding Allotment in the Antelope winter range.

Concerning the general run of the EIS, I don't think that the overall reductions of the grazing use are warranted, because as a general rule, the land doesn't need that much reduction. I was pleased with the BLM alternatives B and C on lands suitable for irrigation. I feel that the sooner this land is put on the tax rolls the better off we will be.

Sincerely,

J. D. Baldwin
J. D. Baldwin

10-1 The allotment consists of cheatgrass range with some brush. There is no significant seed source for climax dominant grass species or many of the climax forb species, but the soil appears stable and cheatgrass is not giving way to less-desirable annual weeds. Consequently, our judgment is that trend is static.

10-2 Large herds of antelope have been sighted within one and one-half miles of this allotment in winter. This is a very small allotment and could fall inside or outside of true winter range. The lines drawn to delimit winter range are not precise enough to include/exclude small tracts of land along the boundary.

We do intend to consider this allotment in NMP preparation. At that time, Mr. Baldwin will have opportunity to comment on specific land use decisions that concern him.

Letter Number 11

June 19, 1984

Mr. Ervin Cowley, Project Manager
Bureau of Land Management
P. O. Box 2 B
Shoshone, Idaho 83352

Dear Sirs:

I would like to submit my written testimony regarding the Monument Resource Management Plan/Environmental Impact Statement.

In 1975, my wife and I filed a Carey Act claim on approximately 320 acres, legal description T9S, R28EBM, S13, S14NW1/4, S14SE1/4; T9S, R29EBM, S18, Lot #3; N1SW1/4; in Power County (also numbered 9000, 28 and 29).

I want to be on record favoring Alternative B or C. The land we filed on would be excellent for agricultural development. It has good soil, gentle terrain, and is near water and power. The land adjacent to our claim is privately owned and is currently being farmed with great success.

The land has been classified as mineral in nature. Some mining has been done within a couple miles of our Carey Act claim, but with little or no success. Any gold or other minerals located on this property would be so minuscule in nature that mining could not be feasible. However, as a precautionary measure, I filed a mining claim over my Carey Act claim several years ago. I did this to prevent some gold-crazed outsider from filing on it, and further complicating the status of the land. (I know for a fact that some excited people will file mining claims for miles around even a minute location of gold.)

There is no doubt in my mind that this land in question is ideal for agricultural development, and should be thusly classified.

I regret that I was unable to testify in person at this time. I would like to discuss this with you in more detail at a future date.

Thank you for your consideration.

Sincerely,

Carl Henry Hoge
Carl Henry Hoge
Anne E. Hoge
Anne E. Hoge
Route One
Aberdeen, Idaho 83210

Power Soil Conservation District

American Falls, Idaho 83211

June 19, 1984

Ervin Cowley, Project Manager
Bureau of Land Management
P. O. Box 2 B
Shoshone, Idaho 83352

Dear Mr. Cowley:

Following are the comments of the Power Soil Conservation District. We would like to support alternative plan C for the Monument Resource Management Plan.

Some of the important points of the alternative that we strongly agree with are:

1. Most of the soils are highly erosive and should remain in native vegetation.
2. There is presently a good stand of native and seeded vegetation which has been improved over the past 30 years. This has been accomplished through the co-operation of the present permittee's and the Bureau of Land Management.
3. We would also like to point out the over-production of crops now. The farmers are receiving less because they have and are producing more than the people can consume. The federal government is presently paying billions of dollars to induce farmers not to produce certain crops. If this was put into crop production it would be counter-productive to the present agricultural programs.
4. We are not advocating that this land be permanently removed from consideration as cropland. If in the future, this land is needed for crop production, it will be far more feasible and economical to consider it for desert entry at that time.

If you need further support for your Management Plan, please let us know at the District Office.

Sincerely,

Willis W. Williams
Willis W. Williams, Chairman
Power Soil Conservation District

Mr. Ervin Cowley, Project Manager
Bureau of Land Management
P. O. Box 28
Shoshone, Idaho 83352

Re: Monument Resource Management Plan

In regard to the Monument Resource Management plan, we are primarily interested in the land immediately north and east of Wilson Lake in the Northside Grazing Unit.

We have spent considerable time and money in this area fencing two private allotments intermingled with our seeded ground. This land is used primarily in the Spring for early grazing while our irrigated pastures grow and mature. It is a vital link in the operation of the ranch and we feel these AUM's and small plots of Federal land are very important. It will cut the carrying capacity of this ranch considerably if the small tracts and AUM's are disposed of or changed to another use. We feel the highest use is now being made of this land and should not be changed.

We have a monetary interest in this operation.

Sincerely,

G. K. Munsee
G. K. Munsee
Lafree Munsee

July 10, 1984

Mr. Ervin Cowley
Project Manager
Bureau of Land Management
Shoshone, ID 83352

Dear Mr. Cowley:

I wish to comment on the Monument Resource Management Plan Draft Environmental Impact Statement.

Concerning the Wendell Cattle Allotment, you state in Table D-1; it has 3,237 acres of poor and 7,204 acres of seeded.

You state that poor rating would have up to 25% of kinds, amounts, and proportions of potential vegetation. None of the land in the Bennett Hills R.A. is rated Good, which would indicate that your estimation of the potential is in error; particularly when you consider the allotments that have no active grazing; preference.

On the Wendell allotment with 7,204 acres seeded using your figure on page D-13 of 4 acres per AUM for seeded land it would give 1,801 AUM's for the seeded ground. Using the 10.2 acres per AUM for native with 3,237 acres it equals 317 AUM's for a total of 2,118 AUM's yet your proposed alternative calls for just 1,149 AUM's which has to be totally uncalled for.

Your Map 16 calls for the majority of the plant land (Map 11) to be seeded which would further increase the acreage of land capable of running 4 AUM's per acre and increase the carrying capacity of the allotment.

Map 9 showing the apparent trend shows 2 pastures in upward trend and two in downward trend. When the trend studies were conducted, the allotment had just experienced a large fire and the two pastures in the downward trend were used heavier

Mr. Ervin Cowley
Page 2
July 10, 1984

than normal for several years as a result of the fire. Also, the 2 pastures in upward trend compose significantly more than 50% of the acreage which would indicate an adjustment in allocation of AUM's among the pastures, not in an overall adjustment of 57% reduction.

Map 6 shows the allotment in a Zone Two (high frequency fire area); Map 7 shows it as important antelope winter range. One of the objectives in Alternative C is fire control on antelope range. Common sense indicates that one of the best methods of fire control is grazing.

A 57% reduction would almost insure the elimination of 3 of the 4 operators as there would be less than 250 head of cattle left on the allotment; and the facts and figures do not justify putting 3 operators out of business.

I would like to make a few general comments about the overall E.I.S.

You have 33 out of 59 allotments classified Custodial. If I or anyone else operated 65% of our business in a custodial manner, we would soon be out of business. Maybe that is why over 50% of your native range is classified as poor.

I also think that your statement about control of noxious weeds needs to be expanded to control noxious weeds at whatever the cost.

Response to Letter Number 14

14-1 All of this area was extensively disturbed in the past, and the full complement of native forbs and grasses appear only as scattered, minor remnants. Present grazing use has little to do with the situation which has resulted from past disturbance, and was essentially complete prior to adjudication in 1965. Even the seedlings would not be considered good ecological condition because the dominant species was not part of the native plant community.

14-2 In Alternatives B and C, we proposed that 6,024 acres of the Wendell Cattle Allotment would be considered for agricultural development. If these were all transferred, 1,180 acres of existing seeding would be left, and 2,268 acres would be newly seeded to offset the loss of land as much as possible. At 3.0 acres/AUM (assumed because intensive grazing management would continue), this would total 1,149 AUMs (3,448 acres divided by 3.0). The remaining acres not lost to transfer would continue to be unproductive rock outcrop, with the seedlings carrying the grazing. Existing average stocking rate in Wendell Cattle Allotment is 3.89 acres/AUM.

Wendell Cattle Allotment

Tom Wallb
Ernie Eldred
Allyne W. Dargatz

July 6, 1984

Mr. Ervin Cowley, Project Manager
Bureau of Land Management
P.O. Box 28
Shoshone, Idaho 83352

RE: Comment on the Draft Monument Resource Management Plan/Environmental Impact Statement

Dear Mr. Cowley:

I greatly appreciate this opportunity for public review and comment upon the Draft RMP/EIS. I have a number of comments regarding the grocery list of issues with which this document is initiated, the alternatives presented, and site-specific matters. The order in which I treat these topics does not reflect a hierarchy of significance.

- o Discussion of current Sole Source Aquifer designation studies by the U.S. G.S. and the E.P.A.

The draft EIS does not cite or discuss the potential designation of the Snake River Plain aquifer which underlies the study area as a sole source natural resource. Since the documentation overwhelmingly supports sole source qualification, and since it represents the best available scientific evidence on the topics treated, the BLM should discuss the issue and cite these references:

- Young, H.W. and M.L. Jones. 1984. Hydrologic, Demographic, and Land-Use Data for the Snake River Plain, Southwestern Idaho. U.S. Geological Survey Water-Resources Investigations Report 84-4001. Prepared in cooperation with the U.S. Environmental Protection Agency.
- Marshall, W. March. 1984. Support Document for the EPA Designation of the Snake River Plain Aquifer as a Sole Source Aquifer. U.S. EPA Region 10, Seattle, Washington.
- U.S. Geological Survey. 1984. Locations of current ground-water observation wells, and proposed observation wells and water quality sampling sites, Snake River Plain Aquifer. Water Resources Investigations 84-4001, Plate II.
- U.S. Geological Survey. 1984. Land use and ownership, water use, and contributory drainage area to the Snake River Plain Aquifer. Water Resources Investigations 84-4001 (unnumbered plate).
- U.S. Geological Survey. 1984. Depth to water, March 1980, in the Snake River Plain Aquifer. Water Resources Investigations 84-4001, Plate 2.
- U.S. Geological Survey. 1984. Water-table contours, March, 1980, in the Snake River Plain Aquifer. (This updates an open-file report by Lindholm, et al, 1983).

-1-

- o The rare, threatened, or endangered species list omits a number of species for which status reviews have recently been completed, and others about which less is known should be listed. For example, the FEIS should cite the Status Reviews of the Bliss Rapids Snail, Snake River Physa Snail, Utah Valvata Snail, Plant Columbia River Limpet, and the Shoshone sculpin. The Bliss Rapids Snail and Snake River Physa Snail are now Category I organisms on the priority list for Federal protection (the others are Category II). The FEIS should also mention the white sturgeon and the Fish and Game studies on the species in the Snake River bordering the study area. The desert night snake, verified from Box Canyon, should also be cited, and the most recent publication of the Rare and Endangered Plants Technical Committee should be consulted.
- It would be extremely useful to the reviewing public to be able to refer to a map indicating areas or habitats in which these species local occurrences are focused, including rare, threatened, or endangered (candidate or designated) plants, animals and plant communities. The BLM staff responsible for the preparation of the DEIS is to be highly commended for the preparation of tables such as those on page 2-67. A similar analysis should be constructed for plants. In conjunction with maps of the host habitats, these would allow the reader a better assessment of the impact of the alternatives upon this generic group of organisms.
- o Wildlife AUM allocations at present in all of your alternatives are not presented, nor is it clear why wildlife AUM allocation is not adequately treated. Projections of alternative impacts are made upon what BLM must consider indicator or primary species (mostly large mammals), but other more subtle issues such as the impacts of additional bovine grazing pressure or the accompanying "range improvements" upon plant and animal species diversity are not treated. For each alternative the FEIS should clearly and thoughtfully present a realistic projection of the result it would have upon ecological naturalness, as measured by shift in species diversity, changes in community interrelationships, and successional events. (Obviously after so many years of grazing and the intrusion of introduced species there are few sites which have remnant native communities, but the FEIS should identify what these new interferences - spraying, seeding with introduced species, applying widespread large herbivore grazing pressure, the behavioral problems cattle have which exclude indigenous wildlife, and so forth - have upon the ecosystem as it is now. Is the public domain going to become more disturbed, how will existing elements of naturalness be affected, and how will these alternatives change species diversity in different habitats? Any shift away from naturalness on public domain lands should be carefully identified and avoided.)
- As you know, I disagree with the range of alternatives presented in this document and doubt that they would survive superior court scrutiny for compliance with NEPA. The range of alternatives, FLPA, and NEPA are discussed later in these comments, but the fundamental problem with this whole management plan is that it does not comply with sustained yield management, it does not offer true multiple use (rather it is designed to accommodate present or added livestock use), and it is an approach which betrays least-consequence stewardship for emphasis upon commodity and consumptive uses of a fragile public resource. Livestock use of forage is only one of many uses and it is difficult to understand how designating 99% of the forage available to livestock can give wildlife a fair shake. I am attaching previous letters to your office and others which state my opinion on better allocations of public domain resources.
- I am adamantly opposed to Cooperative Management Agreements, and request full NEPA compliance through EIS analysis and preparation for these lands. After all, the management plans flowing from these Agreements are made by special interest beneficiaries - ranchers - who are not trained professionals, as all public domain managers should be. This whole program is not in the public interest as it plays right into the hands of special interests and should at the least be examined in

U.S. Geological Survey. 1984. Water-level hydrographs and locations of selected wells, Snake River Plain Aquifer. Water Resources Investigations 84-4001, Plate 4.

U.S. Geological Survey. 1984. Estimated 1980 recharge to and discharge from the Snake River Plain Aquifer. Water Resources Investigations 84-4001, Plate 5.

U.S. Geological Survey. 1984. Spring Flows and annual spring discharge, and locations of selected springs, Snake River Plain Aquifer. Water Resources Investigations 84-4001, Plate 6.

U.S. Geological Survey. 1984. Water quality sites on the Snake River Plain Aquifer and Snake River. Water Resources Investigations 84-4001, Plate 7.

U.S. Geological Survey. 1984. Generalized soils overlying the Snake River Plain Aquifer. Water Resources Investigations 84-4001, Plate 8.

U.S. Geological Survey. 1984. Population distribution, Snake River Plain and contributory drainage area. Water Resources Investigations 84-4001, Plate 9.

U.S. Geological Survey. 1984. Waste water and solid waste disposal sites, Snake River Plain and contributory drainage area. Water Resources Investigations 84-4001, Plate 10.

This magnificent set of plates is available upon request from Dr. Gerald Opatz, E.P.A., 1200 Sixth Avenue, Seattle, Washington 98101, and your office should request copies for reference. Why not incorporate these - perhaps even directly - into figures such as Map 14? I would like to see maps added reflecting Plate 9 (population distribution), the Unnumbered Plate (Land use and ownership, water use), the Water table contours Plate, Depth to water (Plate 2), and a summary of Young and Jones (1984) discussing hydrologic, demographic, and land use data for the study area. This could be easily accomplished and is necessary for the reviewing public to accurately understand the implications of the land-use decisions your alternatives represent.

- o [The Final EIS should cite other designated and candidate National Natural Landmarks within the broad boundaries of the management area. These include Niagara Springs (a designated Landmark); Malad Canyon, and the Wiley Reach of the Snake River (in addition to Box Canyon and Vineyard Creek). I appreciate your citing my Box Canyon study, and urge you to also cite my Malad Canyon and Wiley Reach papers. Similarly, you should note that the Wiley Reach and Lower Malad Canyon were listed as the sixth ranked site in the state in the U.S. Fish and Wildlife Service's (Boccard, 1980) "Important Fish and Wildlife Habitats in Idaho." The Wiley Reach should be designated on your figure (Map 13) depicting "Wilderness and Recreation" since it was identified by the Heritage Conservation Recreation Service (and subsequently the National Park Service) as one of the 22 river segments in Idaho having promise for Wild and Scenic River qualification (you should cite the Nationwide Rivers Inventory.) The two sites you list are nice whitewater but didn't qualify in the NPS study - you should at least put the one local site on the map which did. You should also cite the FERC EIS on the A.J. Wiley Project and Eagle Rock Project, and the NSF sponsored study on the Wiley Reach should be cited.

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*The Dry Cataracts is another designated Landmark whose Natural Landmark Brief should be listed in your bibliography.

an EIS format in which real alternative management strategies are analyzed by the BLM public domain steward professionals and by the public itself.

In closing on the topic of wildlife resource analysis, let me simply state that I philosophically disagree with pumping up the forage ecosystem with a greatly added load of introduced grasses so that you can actually increase livestock AUM allocations at the expense of greatly accelerating ecological disturbance and the continuing trend away from ecosystem naturalness. From my perspective, the BLM should not regulate public domain as if it were a private cattle ranch, but rather should be calculating sustained yield on present forage bases and doing everything possible to reverse and mitigate the successional problems now pervasive in the west. By opting for continuing the practice of seriously manipulating the dominant species in these mixed introduced/native grasslands, what is really happening is a continued replacement of native species and a continued trend toward much lower species diversity of natives.

Change in proposed AUM allocation from the present (No Action - Alt. A):

	Livestock AUMs	Wildlife AUMs	%Change from Present
Alt. A	97,564	-	0
Alt. B	150,100	-	+54%
Alt. C	144,776	-	+48%
Alt. D	59,106	-	-39%
Sub-alt. D	0	-	-100

As you probably can guess, I also disagree with using ecological reasons (i.e., patches of crested wheat grass introduced during historic "range improvement" efforts) as a basis for excluding or down-grading WSA sites. I thought that you might appreciate the following excerpt from Munzing and O'Hara's "Washington Wilderness: The Unfinished Work":

MYTH 4: Wild areas must be virgin and pristine in order to qualify for wilderness.

- 1 Coggins (1984) recommends using critical forage year (drought) data for AUM allocation. What would these levels be for the Monument area and how would even Alt. A livestock allocations impact wildlife during such an episode? Least consequence stewardship would concur with Coggins conservative approach.

Wilderness also need not be completely isolated from the "sights and sounds" of man's activities.

The "sights and sounds" criterion is a tactic that is used to minimize the amount of land that can be considered for wilderness; it is especially useful when managers seek to exclude lowland forests and approach routes from wilderness consideration. Glances of logging roads in the distance or the sounds of activities occurring outside of an area are not valid reasons for excluding it from wilderness consideration. Such "sights and sounds" have only a small effect on a visitor's appreciation for wildland, in fact, they often foster a greater appreciation for land that is still unaltered.

Were introduced species reason for wilderness exclusion, cows would be conspicuous candidates for removal, which is not necessary unless they interfere with naturalness through serious overgrazing.